

IN THE
UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

NATIONAL TPS ALLIANCE, <i>et al.</i> ,)	
)	
)	
Plaintiffs-Appellees,)	
)	
v.)	No. 25-2120
)	
KRISTI NOEM, <i>et al.</i>)	
)	
Defendants-Appellants.)	
)	

**MOTION FOR LEAVE TO FILE CORRECTED BRIEF *AMICUS CURIAE*
IN SUPPORT OF APPELLANTS AND REVERSAL**

Amici Curiae America's Future, Citizens United, and Conservative Legal Defense and Education Fund hereby move for leave to file a Corrected Brief *Amicus Curiae* in support of the Defendants-Appellants and Reversal. It is hereby stated as follows:

1. *Amici* America's Future, Citizens United, and Conservative Legal Defense and Education Fund filed a Brief *Amicus Curiae* with the consent of the parties on May 7, 2025 in this case.
2. Counsel for *amici curiae* were advised by counsel for Plaintiffs of new information not previously known to them when their *amicus* brief was filed and submitted a letter to the Clerk to advise the Court about that new information. The

Clerk's office advised counsel for *amici* that such a letter would not be accepted without a motion for leave to file such a letter, or *amici* could file a corrected *amicus* brief with a motion for leave.

3. Accordingly, submitted with this motion is a Corrected Brief *Amicus Curiae*. The only changes made to the *amicus* brief originally filed are deletions made both in the initial Statement and in the Conclusion in the Corrected Brief *Amicus Curiae* based on this new information, adjusting the page numbers in the table of contents and table of authorities. No additional language was added.

4. Thus, it is believed that no party will be prejudiced by the Court's acceptance of the Corrected Brief *Amicus Curiae*.

WHEREFORE, we respectfully request that this Court grant leave to file a Corrected Brief *Amicus Curiae* in support of Defendants-Appellants and Reversal.

Respectfully submitted,

/s/ Jeremiah L. Morgan
Jeremiah L. Morgan
WILLIAM J. OLSON, P.C.
370 Maple Avenue West, Suite 4
Vienna, VA 22180-5615
(703) 356-5070
wjo@mindspring.com

Attorneys for *Amici Curiae*
America's Future, *et al.*
May 20, 2025

CERTIFICATE OF COMPLIANCE WITH RULE 27(d)(2)(A)

IT IS HEREBY CERTIFIED:

1. That the foregoing Motion for Leave to File Corrected Brief *Amicus Curiae* in Support of Defendants-Appellants and Reversal complies with the type-volume limitation of Rule 27(d)(2)(A), Federal Rules of Appellate Procedure, because this motion contains 254 words, excluding the parts exempted by Rule 32(f).
2. This motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using WordPerfect version 21.0.0.194 in 14-point Times New Roman.

/s/ Jeremiah L. Morgan

Jeremiah L. Morgan
Attorney for *Amici Curiae*
America's Future, *et al.*

Dated: May 20, 2025

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing Motion for Leave to File Brief *Amici Curiae* in Support of Defendants-Appellants and Reversal, was made, this 20th day of May 2025, by the Court's Appellate Case Management System upon the attorneys for the parties.

/s/ Jeremiah L. Morgan

Jeremiah L. Morgan
Attorney for *Amici Curiae*
America's Future, *et al.*